## **EXHIBIT 3**

(Redline Comparison - Updated Form of Notice of Omnibus Objection)

Weil, Gotshal & Manges LLP 767 Fifth Avenue New York, NY 10153-0119

Case: 19-30088 Doc# 8138-3 Filed: 06/26/20 Entered: 06/26/20 17:33:14 Page 1 of 5

WEIL, GOTSHAL & MANGES LLP Stephen Karotkin (pro hac vice) (stephen.karotkin@weil.com) Ray C. Schrock, P.C. (pro hac vice) (ray.schrock@weil.com) 3 Jessica Liou (pro hac vice) (jessica.liou@weil.com) Matthew Goren (pro hac vice) (matthew.goren@weil.com) 767 Fifth Avenue New York, NY 10153-0119 Tel: 212 310 8000 Fax: 212 310 8007 IN THIS CASE. KELLER BENVENUTTI KIM LLP 8 Tobias S. Keller (#151445) (tkeller@kbkllp.com Peter J. Benvenutti (#60566) CLERK, LLC, AT [] (pbenvenutt@kbkllp.com)) 10 Jane Kim (#298192) (jkim@kbkllp.com) 650 California Street, Suite 1900 San Francisco, CA 94108 12 Tel: 415 496 6723 NO COST TO YOU. Fax: 650 636 9251 13 Attorneys for Debtors and Debtors in Possession <u>15</u> UNITED STATES BANKRUPTCY COURT 16 NORTHERN DISTRICT OF CALIFORNIA SAN FRANCISCO DIVISION 17 <u>18</u> 19 In re: PG&E CORPORATION, <u>20</u> Chapter 11 21 - and -<u>22</u> PACIFIC GAS AND ELECTRIC COMPANY, <u>23</u> **Response Deadline:** Debtors. <u>24</u> ☐ Affects PG&E Corporation <u>25</u> ☐ Affects Pacific Gas and Electric Company <u>26</u> Date: ★ Affects both Debtors Time: <u>27</u> \* All papers shall be filed in the Lead Case,

No. 19-30088 (DM).

28

Formatted: Right THE OBJECTION DESCRIBED IN THIS NOTICE ASKS THE COURT TO DISALLOW AND EXPUNGE YOUR CLAIM(S) IDENTIFIED ON THE FOLLOWING PAGE OF THIS CLAIMANTS RECEIVING THIS NOTICE SHOULD READ THIS NOTICE CAREFULLY BECAUSE THE OBJECTION MAY AFFECT YOUR RIGHT TO RECEIVE A DISTRIBUTION ON YOUR CLAIM IF YOU HAVE QUESTIONS, PLEASE CONTACT PRIME THE LAST PARAGRAPH OF THIS
NOTICE EXPLAINS HOW YOU
CAN OBTAIN A COMPLETE
COPY OF THE OBJECTION, AT Bankruptcy Case No. 19-30088 (DM) (Lead Case) (Jointly Administered) NOTICE OF THE DEBTORS' [ORDINAL] OMNIBUS OBJECTION TO CLAIMS **Hearing Information If Timely Response Made:** 

Case: 19-30088 Doc# 8138-3 Filed: 06/26/20 Entered: 06/26/20 17:33:14 Page 2

of 5

<u>3</u>

6

9

10

<u>11</u>

12

13

14

<u>15</u>

<u>16</u>

17

18 19

<u> 20</u>

21

<u>24</u>

26

27

Formatted: Right [Claimant Name] Basis for Filed Proposed Surviving Objection Claim# Debtor Classification Classification Claim# Date Amount Amount Amount On [date], PG&E Corporation and Pacific Gas and Electric Company, as debtors and debtors in possession (the "Debtors") in the above-captioned chapter 11 cases (the "Chapter 11 Cases"), filed their [Ordinal] Omnibus Objection to Claims (the "Omnibus Objection") with the United States Bankruptcy Court for the Northern District of California (San Francisco Division) (the "Bankruptcy Court"). [A full copy of the Omnibus Objection may be obtained at no cost, as provided below.] By Any Response (as defined below) to the Omnibus Objection, must be filed and Formatted: Font: Bold served upon the Debtors seek to disallow Debtors' Counsel by [date that is 14 days Formatted: Font: Bold before hearing date (the "Response Deadline"); Any Response must be accompanied by any declarations or reduce one or Formatted: Font: Bold more memoranda of law any responding party wishes to present in support of its Formatted: Font: Bold position; If there is no timely Response, the Bankruptcy Court may enter an order granting the Omnibus Objection to your Proof(s) of Claim (as defined therein) listed above on Formatted: Font: Bold the grounds that the Proof(s) of Claim is/are: [grounds]. Any Proof of Claim that the Bankruptcy Court disallows by default. If you file a timely Response, the Hearing will be treated as if it had not been filed Formatted: Indent: Left: 0.5", First line: 0", Right: 0.5", and you will held at the date and time shown below. If factual disputes are Space After: 6 pt presented by the Objection and the Response, the Hearing will proceed as a status conference; factual disputes will not be decided at the Hearing, but at a future evidentiary hearing that may be set at the Hearing. Issues of a purely legal nature, where facts are not be entitled to any distribution on account thereof.in dispute, may be decided at the Hearing. [See Bankruptcy Local Rule 3007-1.] The Bankruptcy Court will hold a hearing on [date], 2020, at 10:00 a.m. (Pacific Time) (the "Hearing") If you file and serve a timely Response, the date, location and time of the Hearing are: [date and time] Courtroom 17, 16th Floor, 450 Golden Gate Ave., San Francisco, CA The Hearing will be held before the Honorable Dennis Montali, United States Bankruptcy Judge. Pursuant to the Bankruptcy Court's Amended General Order No. 38 In re: Coronavirus Disease Public Health Emergency, dated March 30, 2020, the Omnibus Hearing will be conducted telephonically. The courtroom will be closed. All parties who wish to appear at the Hearing must make arrangements to appear telephonically with CourtCall at 1-866-582-6878 no later than 4:00 p.m. (Pacific Time) on the day before the Hearing. Further information regarding telephonic appearances via CourtCall can be found on the Bankruptey Court's website, at the following location: www.canb.uscourts.gov > Rules and Procedures > District Procedures > Policy and Procedure for Appearances by Telephone. Charges have been waived by CourtCall for pro se partiesshould refer to the Bankruptcy Court's website [ link ] for current information about how to appear. Debtors Counsel will, as a courtesy and on request, provide by email to those who have filed timely Responses updated information regarding how to attend.

Case: 19-30088 Doc# 8138-3 Filed: 06/26/20 Entered: 06/26/20 17:33:14 Page 3

<u>1</u>

2

3 4 5 Page 4 Formatted: Font: Not Bold

BASIS FOR OBJECTION TO YOUR PROOF(S) OF CLAIM: By the Omnibus Objection, the Debtors seek to disallow or reduce one or more of your Proof(s) of Claim (as defined therein) listed above on the grounds that the Proof(s) of Claim is/are:

[state grounds for objection].

If you do **NOT** oppose the disallowance or reduction of your Proof(s) of Claim listed above, then you do NOT need to file a written <u>responseResponse</u> to this Omnibus Objection and you do NOT need to appear at the Hearing.

FILING AND SERVICE OF RESPONSE: If you DO oppose the disallowance or reduction of your Proof(s) of Claim listed above, then you MUST file a response (a "Response"), in writing, with the Bankruptcy Court, and serve it on the counsel for the Debtors at the above-referenced addresses so as to be received by no later than 4:00 p.m. (Pacific Time) on [\*], 2020. Any oppositions or responses must be filed and served on all "Standard Parties" as defined in, and in accordance with, the Second Amended Order Implementing Certain Notice and Case Management Procedures entered on May 14, 2019 [Dkt No. 1996] (the "Case Management Order"). The relief requested in the Omnibus Objection may be granted without a hearing if no opposition is timely filed and served in accordance with the Case Management Orderemail addresses so as to be received by no later than 4:00 p.m. (Pacific Time) on [•], 2020 (the "Response Deadline"): You must file the Response through the Court's electronic case filing ("ECF") system if you have access to the ECF system; service on Debtors' Counsel will occur automatically upon ECF filing; and no separate service of Response is required. If you do NOT have access to the ECF system, service must be made by electronic mail to the email addresses of the Debtors' counsel as shown on the Objection, and you must arrange for the Response to be filed with the Court within two business days thereafter. If you do not have the ability to serve a Response electronically, the Response must be served by mail, express or some other means so either (a) it is actually received by Debtors' Counsel by the Response Deadline, or (b) it is dispatched not later that the Response Deadline through a postal or commercial express service that will make actual delivery not more than two business days after the Response Deadline. and in that case the Claimant must inform Debtors' counsel by email, telephone or facsimile before the Response Deadline of the Claimant's name and phone number, the number of the Omnibus Objection, and the fact that a paper Response is being delivered by express,

CONTENTS OF RESPONSE The Response must, at a minimum, include the following: (i) a caption setting forth the name of the Bankruptcy Court, the name of the Debtor, the case number and title of the Omnibus Objection to which the Response is directed; (ii) your name, the assigned number(s) of your Proof(s) of Claim, and an explanation for the amount of the Proof(s) of Claim; (iii) a concise statement setting forth the reasons why the Bankruptcy Court should not sustain the Omnibus Objection, including, without limitation, the specific factual and legal bases upon which you will reply in opposing the Omnibus Objection; (iv) a copy of any other documentation or other evidence of the Proof of Claim, to the extent not already included with the Proof of Claim, upon which you will rely in opposing the Omnibus Objection at the hearing; (v; (iv) a declaration under penalty of perjury of a person with personal knowledge of the relevant facts that support the Response; (vi) your name, address, telephone number, and/or the name, address, and telephone number of your attorney and/or designated representative to whom counsel for the Debtors should serve a reply to the Response, if any; and (vii) the name, address, telephone number, and email address of the party with authority to reconcile, settle, or otherwise resolve the Omnibus Objection on your behalf, if any.

If the Bankruptcy Court does not disallow or reduce your Proof(s) of Claim listed above, then the Debtors have the right to object on other grounds to your Proof(s) of Claim at a later date. You will receive a separate notice of any such objection.

Formatted: Font: Not Bold

262728

TO GET COPIES OF THE COMPLETE OBJECTION: Copies of the complete Omnibus Objection and the other pleadings and documents identified herein can be viewed and/or obtained: (i) by accessing the Bankruptcy Court's website at http://www.canb.uscourts.gov [PACER account required], (ii) for free by download from on the Debtors' approved notice and claim agent's website at https://restructuring.primcelrek.com/pge/Home-DocketInto, or (iii) by mail, for free, by calling Primc Clerk LLC at (844) 339-4217 (Toll Free) or by email at pgeinfo@primcelerk.com to request a complete copy of the Omnibus Objection, including all Exhibits.

Dated: [•], 2020

WEIL, GOTSHAL & MANGES LLP KELLER BENVENUTTI KIM LLP

//s/
Peter J. Benvenutti

Attorneys for Debtors and Debtors in Possession

of 5